

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Criminal No. 2:12MJ21**

**CARISSA HADS,**

**Defendant.**

**MOTION FOR DETENTION HEARING**

The United States moves for pretrial detention of defendant pursuant to 18 U.S.C. 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because case involves (check all that apply):

- Crime of violence (18 U.S.C. 3156 and 3142(f)(1)(A))
- Maximum sentence life imprisonment or death (18 U.S.C. 3142(f)(1)(B))
- 10+ year drug offense (18 U.S.C. 3142 (f)(1)(C))
- Felony, with two prior convictions in above categories (18 U.S.C. 3142(f)(1)(D))
- Any felony not otherwise a crime of violence that involves the possession of a firearm (18 U.S.C. 3142(f)(1)(E))
- Serious risk defendant will flee (18 U.S.C. 3142(f)(2)(A))
- Serious risk obstruction of justice (18 U.S.C. 3142(f)(2)(B))

2. Reason for Detention. The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- Defendant's appearance as required  
 Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant under Section 3142(e). The presumption applies because:

- Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. 924(c)  
 Previous conviction for "eligible" offense committed while on pretrial bond.  
 Pursuant to the Adam Walsh Act, defendant is facing a 922(g) indictment  
 Defendant committed an offense involving a minor victim under 2423(b) of Title 18.

4. Time for Detention Hearing. The United States requests the court conduct the detention hearing

- At first appearance  
 After continuance of \_\_\_\_ days (not more than 3)

5. Other Matters: \_\_\_\_\_

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DATED this 6<sup>th</sup> day of June, 2012.

/s/ Shawn Angus Morgan  
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